

EXHIBIT C

people and groups hostile to Planned Parenthood's mission; monitoring security conditions and conducting ongoing analysis of data received from internal and external sources; advising on risk mitigation strategies; disseminating security alerts to management and staff; overseeing security incident response planning and investigation of breaches; and preparing and submitting incident reports per Planned Parenthood and regulatory requirements. I submit this Declaration in support of Defendants' Response to Plaintiffs' Motion for Entry of Protective Order in the above-captioned action. I have personal knowledge of the facts contained herein.

2. Information regarding threats, intimidation, and/or harassment that I receive comes from various sources, including directly from employees, patients, and other individuals; via PPGT's security surveillance camera system; from open-source intelligence searches, as well as information and reports received from my own observations. The information reported, along with my investigation, is entered into PP's Affiliate Incident Management System (AIMS) reporting system. If warranted, I also report the threat/intimidation/harassment to law enforcement.

3. In the course of my duties at PPGT, I regularly receive and respond to information about security threats, harassment, violence and threatened violence, and intimidation against our staff, patients, and facilities. Below are examples of such incidents reported directly to me, along with incidents I have personally experienced.

4. On July 23, 2013 I was advised via email from PPGT Waco administrative employee Doe 1,¹ that local Waco protestor Smith 1, had approached Waco clinician Doe 2 after she parked her vehicle in the parking lot and was walking into the building, by calling her by her name and saying he knew where she lived and made some references to her neighbors. I informed

¹ In order to maintain the anonymity of the individuals referenced in this declaration, I refer to PPGT staff referenced in this declaration as Doe 1, Doe 2, etc., and I refer to the individuals who have sought to intimidate or harass the PPGT staff as Smith 1, Smith 2, etc.

Doe 2 to be careful and cautious while traveling to and from work and that for a short period of time, to park closer to the building; to always be aware of her surroundings to include suspicious vehicles and people around her neighborhood; and to immediately report if she sees or hear anything suspicious.

5. On December 20, 2013, Doe 3, a nurse practitioner on staff with PPGT, reported to me that she received a Christmas card at her home address from Smith 2, a person known to PPGT to be a member of Pro-Life Waco, indicating that he was aware of her name, association with PPGT, and home address. She reported that she had recently visited the PPGT Waco Health Center and was concerned that the sender copied her license plate number while she was there and located her home address that way.

6. On Thursday, July 16, 2015, I received an email from PPGT Mesquite Health Center Manager Doe 4, advising me that PPGT Mesquite Clinician Doe 5, reported to her that she had received something in her mailbox about "body parts being sold." Doe 4 said that the incident had scared Doe 5 due to the fact that this material was in her mailbox, indicating that someone knew where she worked. I learned that the material which was left in Doe 5's mailbox had not been mailed (no postmark) or delivered by the postal service, but appears to have just been placed in the mailbox. I conducted an open public source search and discovered that Doe 5 had a LinkedIn Account which stated her occupation as a "women's health nurse practitioner at PPGT." I advised Doe 5 about her potential exposure on-line during open public searches linking her to PPGT and to consider locking down and/or limiting her on-line exposure to PPGT. This is the same advice that I provide to all PPGT employees, unless they work in a forward or public-facing position.

7. On November 28, 2017, I received a phone call from Waco PPGT Volunteer Doe 6, reporting that Pro-Life Waco Director Smith 2 was following her around a local store and she

asked him to stop, but he refused. Doe 6 said she then asked the store manager to assist her and that they also asked Smith 2 to stop harassing her and he refused again.

8. On May 2, 2017, a PPGT patient walked into the Waco Health Center and handed a staff member a clipboard found outside. On the clipboard was a list, several pages long, of dozens of then-PPGT employees, along with a description of their vehicles, their license plate numbers, and their home address information. I confirmed the accuracy of the information and saw my own name and several of my vehicles among those included on the list. Also attached to the clipboard was a sheet of return-address labels with the name "Smith 2, Pro-Life Waco" and his home address in Waco, TX. I notified PPGT management and staff, advising them to be alert and exercise good security awareness at home and when away from work because I had concerns that Smith 2 or others were collecting this information so they could intimidate and/or stalk these members of the PPGT staff. I also alerted law enforcement the following day, on May 3, 2017, of my concerns.

9. On February 20, 2019, I was advised that someone had posted on Twitter using the handle Smith 3 tweeted "CANT WAIT TO JIHAD AN ABORTION CLINIC. The same user also made the following comments: "I am a violent psychopath with access to firearms and a lust for tomboy wife It's not easy being a violent psychopath with access to multiple firearms." I learned that on January 28 2019, the same user posted a picture of himself with a grenade launcher and the tag "Now you've seen my face, come get me feds you yellow belied fucking cowards." The author of the tweets was identified as a male living in Waxahachie, TX. After the post was located on-line, I contacted the North Texas Joint Terrorism Task Force (JTTF) to make sure that they were aware of the online post and threat, which they confirmed that they were. I conducted an on-line search and confirmed that the PPGT South Dallas ASC was the closest abortion center to the individual's residence, so I notified the Dallas Police Department to advise them on the on-line

threat. I informed the PPGT leadership team of the post and then traveled to Dallas to meet with staff and provided a copy of the individuals picture to the South Dallas ASC manager and to the on-site contract security officer and advised them that if they see anything or anyone suspicious. to immediately call 911.

10. On December 19, 2020, a contract security officer working at the PPGT Health and Abortion Center in Lubbock reported to me of an unknown person walking on the sidewalk along the public right of way outside the Lubbock Health and Abortion Center. The contract security officer reported that the unknown male was wearing a “sandwich board” which had a sign on the front and the back. On the front of the sign read “Stop Murdering Babies” and on the back of the sign read “Execute abortionists instead.” The unknown male stayed about one (1) hour before leaving.

11. On January 30, 2021, I received a letter from Pro-Life Waco Director Smith 2 at my home address. The envelope contained a full-page ad from the Waco Tribune Herald newspaper titled “Remembering Lives Lost & Hearts Broken,” with a handwritten note reading “Mr. Jordan Would love to include you next year. Smith 2.”

12. On May 24, 2021, I learned that Smith 4, a Lubbock, TX resident known to me to oppose Planned Parenthood and the abortion services it provides, posted a photo of PPGT Chief Medical Officer Dr. Doe 7, M.D. in the Lubbock Health Center parking lot, being escorted by me to a vehicle. Under the photo she stated, “The abortionist Doe 7 leaving for the day with his bodyguard (blue shirt).” I shared this information with Doe 7 and other PPGT employees to advise that opposition members were tracking them and taking photographs, and urging them to take extra precautions for their safety.

13. On November 17, 2021, I received a text message from PPGT employee Doe 8, Reproductive Health Assistant at the El Paso Abortion and Health Center. Doe 8 wrote in her text, Hey Earl, its Doe 8 from El Paso. My boyfriend went to pick me up today from work and he says some guy was taking pictures of his car and license plates for 10 minutes and as soon as the guy saw I pointed my phone to get a picture, he turned around and left.

14. It is my personal and professional opinion that PPGT employees have some exposure to threats, intimidation, and/or harassment by virtue of their work for and association with PPGT. Accordingly, I advise them about their exposure on open public searches and encourage them to use maximum privacy settings online. I encourage them not to park in the same parking spaces; to travel different routes to and from work; to vary their schedule as much as possible; and not to wear their ID name badges or any work clothes or uniforms that identify them as working for PPGT while off-site. Nevertheless, incidents like those described above still occur despite our employees' best efforts to remain anonymous and keep their employment with PPGT confidential.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 27, 2022.


Colon Earl Jordan, Jr.